

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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PAULINA KORENBLUM, FREDY :  
GIRON, and KENNETH M. WEBB, :  
on behalf of themselves and all others :  
similarly situated, :

Plaintiffs, :

v. :

CITIGROUP, INC., :

Defendant. :

Case No. 15-cv-3383-JMF

-----X  
**DECLARATION OF MICHAEL J. PUMA IN SUPPORT OF  
CITIGROUP INC.'S MEMORANDUM OF LAW IN OPPOSITION  
TO PLAINTIFFS' MOTION FOR CONDITIONAL CERTIFICATION**

I, Michael J. Puma, an attorney in good standing admitted to practice in this Court,  
hereby declare as follows:

1. I am a partner with the law firm of Morgan, Lewis & Bockius LLP, counsel for Defendant Citigroup Inc. ("Citi") in the above-captioned matter. I submit this declaration in support of Defendant's Memorandum of Law in Opposition to Plaintiffs' Motion for Conditional Certification.

2. I was retained in connection with a subpoena served on Citi during the time that *Jones v. The Judge Group*, No. 11-cv-06910, was being litigated in the United States District Court for the Eastern District of Pennsylvania (hereinafter, "*Jones*"). In 2014, while litigating the *Jones* matter, Plaintiffs' counsel, Ryan Stephan, threatened to join Citi as a party in *Jones* during our communications, served Citi with a subpoena for documents/data in *Jones*, and

received documents/data from Citi relating to the *Jones* plaintiffs as part of a compromise production in response to the subpoena.

3. Attached as Exhibit A is a true and correct copy of pertinent portions of the transcript of the January 25, 2016 deposition of Citi's Federal Rule 30(b)(6) witness Donna Gruppuso ("Gruppuso Dep.").

4. Attached as Exhibit B is a true and correct copy of pertinent portions of the transcript of the January 11, 2016 deposition of Plaintiff Paulina Korenblum ("Korenblum Dep.").

5. Attached as Exhibit C is a true and correct copy of pertinent portions of the transcript of the January 19, 2016 deposition of Plaintiff Freddy Giron ("Giron Dep.").

6. Attached as Exhibit D is a true and correct copy of pertinent portions of the transcript of the January 29, 2016 deposition of Plaintiff Kenneth Webb ("Webb Dep.")

7. Attached as Exhibit E is a true and correct copy of pertinent portions of the transcript of the March 22, 2016 deposition of Plaintiff Jose Gomez ("Gomez Dep.")

8. Attached as Exhibit F is a true and correct copy of Plaintiff Paulina Korenblum's resume produced by her in this action.

9. Attached as Exhibit G is a true and correct copy of Plaintiff Fredy Giron's resume produced by him in this action.

10. Attached as Exhibit H is a true and correct copy of Plaintiff Kenneth Webb's resume produced by him in this action.

11. Attached as Exhibit I is a true and correct copy of Plaintiffs' Initial Disclosures served on November 6, 2015.

12. Attached as Exhibit J is a true and correct copy of the Stipulation of Settlement and Proposed Dismissal in *Jones*, Dkt. 181.

13. Attached as Exhibit K is a true and correct copy of the Plaintiff Kenneth Webb's opt-in form in *Jones*, Dkt. 24-1.

14. Attached as Exhibit L is a true and correct copy of the Plaintiff Paulina Korenblum's opt-in form in *Jones*, Dkt. 116-3.

15. Attached as Exhibit M is a true and correct copy of the Plaintiff Fredy Giron's opt-in form in *Jones*, Dkt. 118-1.

16. Attached as Exhibit N is a true and correct copy of Citi's Document Requests to Paulina Korenblum, Fredy Giron, and Kenneth Webb, served November 3, 2015.

17. Attached as Exhibit O is a true and correct copy of Paulina Korenblum's and Fredy Giron's Responses to Citi's Document Requests, served December 4, 2015.

18. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of April 2016.

Dated: April 5, 2016  
New York, New York

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

/s/ Michael J. Puma  
Michael J. Puma